

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KIMBERLY ANN JOHNSON,

Plaintiff,

v.

ALBERTSONS, LLC,

Defendant.

Case No. 2:18-CV-01678-RAJ

JURY VERDICT FORM

We the jury, being duly empanelled and sworn in the above-captioned case, find
as follows:

A. TITLE VII

QUESTION 1: **Title VII Sex Discrimination.** Did Plaintiff prove by a preponderance of the evidence that Plaintiff's sex was a motivating factor for Defendant's decision to terminate her employment?

ANSWER: ☐ YES ☒ NO

• *Please proceed to Question 2*

QUESTION 2: **Title VII Retaliation.** Did Plaintiff prove by a preponderance of the evidence that Plaintiff complained about discrimination and that her complaint was a motivating factor for Defendant's decision to terminate her employment?

ANSWER: ☒ YES ☐ NO

• *Please proceed to Question 3*

B. WASHINGTON LAW AGAINST DISCRIMINATION ("WLAD")

QUESTION 3: **WLAD Gender Discrimination.** Did Plaintiff prove by a preponderance of the evidence that Plaintiff's gender was a substantial factor for Defendant's decision to terminate her employment?

ANSWER: ☐ YES ☒ NO

• *Please proceed to Question 4*

QUESTION 4: **WLAD Retaliation.** Did Plaintiff prove by a preponderance of the evidence that Plaintiff complained about discrimination and that her complaint was a substantial factor for Defendant's decision to terminate her employment?

ANSWER: ☒ YES ☐ NO

- If you answered "no" to Questions 1, 2, 3, and 4, sign this verdict form and notify the bailiff. Answer no more questions.
- If you answered "yes" to any of Questions 1, 2, 3, or 4, proceed to Question 5

C. DAMAGES

QUESTION 5:

Damages Amount. What do you find to be the amount of damages sustained by Plaintiff, if any?

Past Economic Damages: \$ 375,000

Future Economic Damages: \$ 1,500,000

Non-Economic Damages: \$ ~~1,000,000~~ 750,000

- Please proceed to Question 6

QUESTION 6:

Mitigation. Did Defendant prove that Plaintiff failed to mitigate her claimed damages, or that her claimed economic damages should be reduced by any amount earned in mitigation?

ANSWER: [] YES [☒] NO

If you answered "yes" by what amount is Plaintiff's amount of economic damages to be reduced for failure to mitigate damages?

\$ _____

- If you answered "Yes" to Questions 1 or 2, and you awarded damages in Question 5, please proceed to Question 7.

QUESTION 7:

Punitive Damages. Do you find that punitive damages are appropriate?

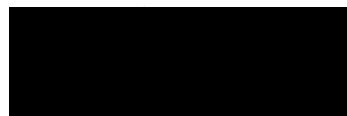
ANSWER: [☒] YES [] NO

If you answered "yes" what do you find to be the amount of punitive damages?

Punitive damages: \$ 10,000,000

- *Sign this verdict form and notify the bailiff*

Signed and Dated this 6th day of March, 2020.



Presiding Juror